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*Attorneys for William Robert Plise*

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:

Case No. BK-S-12-14724-LBR

WILLIAM WALTER PLISE,

Chapter 7

Defendant.

SHELLEY D. KROHN, CHAPTER 7  
 TRUSTEE,

**Adv. No. 13-1047-LBR**

**DECLARATION OF WILLIAM WALTER  
 PLISE**

Plaintiff,

v.

WILLIAM R. PLISE; 5550 LAS VEGAS,  
 LLC,

Date: April 29, 2014

Defendants.

Time: 2:30 p.m.

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DECLARATION OF WILLIAM WALTER PLISE

WILLIAM WALTER PLISE states and declares as follows:

1. I am the Debtor in Bankruptcy Case No. 12-14724 and I am aware of the allegations in Adversary No. 13-01047.

2. I state the following based on personal knowledge.

3. In August 2008, I paid my father, William Robert Plise, \$50,000 for his interest in the 2007 Beaver Contessa 40' motor home that we had previously purchased from Tropical RV Centers.

4. The Contessa motor home was purchased in 2007 by my father and I. My father was credited for \$157,500.00 based on the trade-in of an older motor home and I paid the balance of \$175,913.71 by check from my personal Bank of Nevada account.

5. The Contessa motor home was titled in my father's name. Copies of the following are attached:

- a. sale contract from Tropical RV Centers dated June 1, 2007 which shows the trade-in and the cash balance due;
- b. My check dated June 15, 2007 to Tropical RV; and
- c. Certificate of Title dated June 27, 2007 showing ownership solely in my father's name.

6. In 2008, I purchased my father's interest in the Contessa motor home so I could use it as collateral with the Bank of George. A copy of the following is attached:

- d. Certificate of Title dated June 11, 2008 showing the title to the Contessa motor home transferred to me and the lien given by me to the Bank of George.

7. I paid my father \$50,000 in August, 2008. This \$50,000 payment was in payment for my father's interest in the Contessa motor home.

8. I used the Contessa motor home as collateral (valued at \$220,000) with Bank of George. That is why the Bank of George is listed as a lienholder on the 2008 Certificate

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1 of Title. In September, 2008, I sold my equity in the Contessa motor home (which was  
 2 subject to the Bank of George lien) for \$120,000 to GT Production LLC of Montana (a  
 3 Halverson company). A copy of the following is attached:

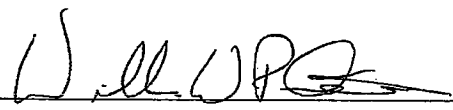
4 e. Bill of Sale to GT Productions.  
 5

6 9. On August 17, 2010, Suzanne Frei cashed a \$50,000 check from the 5550  
 7 Las Vegas, Inc. account at Service First Bank for me. I have had Ms. Frei cash checks for  
 8 me several times in the past and I would usually have Ms. Frei contact me when the funds  
 9 were available and I would meet her at the bank. I did this so I wouldn't have to spend a  
 10 lot of time waiting at a bank for the bank personnel to obtain and count the requested cash.

11 10. On this particular day, I was not available to meet Ms. Frei to take the cash.  
 12 I asked my father to do this for me. At my instruction, Ms. Frei gave the cash to my father.  
 13 Later the same day, my father gave me the \$50,000 in cash. My father held the cash for  
 14 me and delivered the cash to me solely as a favor to me and for my convenience and that  
 15 of Ms. Frei (who, I believed, did not want to hold on to that amount of cash).  
 16

17 I declare, under penalty of perjury, that the foregoing is true and correct, to the best of my  
 18 knowledge, information and belief.

19 DATED: May 17, 2013.

20   
 21 WILLIAM WALTER PLISE  
 22  
 23  
 24  
 25  
 26  
 27  
 28

Jun 14 07 12:12p

Paul Wells

775-727-8970

p.2

FOR OFFICE USE

RM105000JS

**Tropical RV Centers**  
3430 S Hwy 160  
Pahrump, NV 89048  
(775) 727-8822

Order Date: Jun 01, 2007

Purchaser **WILLIAM PLISE**

Tel. No. (702) 871-4065

Street Address **9880 WEST PEBBLE RD**

Town **LAS VEGAS**

State **NV**

County

Zip **89178**

Salesman **Mark Croft**

I hereby agree to purchase from you under the following conditions as specified below:

| New or Used            | Year | Make/Model                       | Type           | Stock Number   |
|------------------------|------|----------------------------------|----------------|----------------|
| New                    | 2007 | Beaver CONTESSA 40LAG4           | A - Motor Home | 1068           |
| Odometer Reading: 1305 |      | Serial Number: 1RF49564971041089 |                | Delivery Date: |

**Accessories Installed by Dealer**

INSTALL 4 GLASSMAT BATTS ON SLIDETRAY  
INSTALL 3 100 WATT SOLAR PANELS  
INSTALL 100 GAL FRESH WATER TANK  
INSTALL REAR PLUG TO MATCH TRAILER  
INSTALL 100 LB SLIDEOUT FREEZER  
INSTALL 12000 LB TRAILER BALL AND WIRING  
TRANSFER ALL BELONGINGS FROM TRADE TO 2007 40

Total Accessories:

**Service/Protection Plans**

**SERVICE CONTRACT**

GAP TERM: GAP Ins.

TIRE WARRANTY

Roadside Assistance

Paint Protection

Etch

0.00

0.00

0.00

**TRADE-IN #1**

Year **2004** Make **DUTCHSTAR**

Model **40** Odometer **16060**

VIN No. **4VZBR1D954C045449**

Amount Owed on Trade \$ **0.00**

Pay-OFF To:

**TRADE-IN #2**

Year Make

Model Odometer

VIN No.

Amount Owed on Trade \$ **0.00**

Pay-OFF To:

\* In some states the "Trade In Allowance" does not reduce the Taxable Total.

Buyer:

Co-Buyer:

Mgr: **John Mathiasen**

Date: **Jun 01, 2007**

Cash Delivered Price **311,816.00**

Total Accessories **2,595.00**

SALES TAX **10,604.96**

Title Fee **28.25**

Service/Protection Plans Total **0.00**

Doc Fee: **199.50**

TOTAL CASH PRICE: **325,243.71**

Trade-In **157,500.00**

Less Pay - off **0.00**

NET ALLOWANCES **157,500.00**

Initial Deposit **0.00**

Open Acct. or Note **0.00**

Cash Due on Delivery **0.00**

Dealer Rebate **0.00**

TOTAL DOWN PAYMENT **157,500.00**

UNPAID BALANCE **167,743.71**

This purchase is made with no warranty implied, and is sold "As Is" (unless otherwise stated). Buyer acknowledges that this agreement includes all of the terms and conditions pertaining to this purchase on both the face and reverse side, and no other agreement or promise of any kind (verbal or written) will be recognized. Upon failure or refusal of the buyer to complete this agreement, all or part of the cash deposit may be retained as liquidated damages. The buyer certifies he/she is of legal age and acknowledges herewith receipt of a copy of this agreement. Not valid unless accepted by Authorized Representative of Tropical RV Centers.

CheckImage

Page 1 of 1

\*122000166\*  
06/16/2007  
6127745241

This is a LEGAL COPY of  
your check. You can use it  
the same way you would  
use the original check.

1299

WILLIAM W PLISE  
9380 WEST PEBBLE RD  
LAS VEGAS, NV 89178

06/15/07

Tropical RV Centers

\$175,913.76

One Hundred Seventy Five Thousand Nine Hundred Thirteen and 76/100

BANK OF NEVADA  
FLAMINGO RD - 4220 W. FLAMINGO RD - LAS VEGAS, NV 89103

1ST INVESTMENT CHECKING

For Cash

4: 122401723: 1299 03 10 13909 0017591371

Front

\*122000166\* 06/16/2007  
6127745241

COMMUNITY BANK OF NEVADA  
FOR DEPOSIT ONLY  
TROPICAL RV CENTERS, LLC  
0402006720

122401723: 1299 03 10 13909 0017591371

06/15/2007

122000166 060  
ENT-1786 TRC-1786 PK-01  
0427934550

Do not endorse or write below this line.

Back

Close



## STATE OF NEVADA

DEPARTMENT OF MOTOR VEHICLES

## CERTIFICATE OF TITLE

VIN 1RF49564971041089 YEAR 2007 MAKE BEAT MODEL 40 VEHICLE BODY TMH TITLE NUMBER NV001930010  
 DATE ISSUED 06/27/2007 ODOMETER MILES 0 FUEL TYPE SALES TAX PD EMPTY WT GROSS WT GWR  
 VEHICLE COLOR ODOMETER BRAND EXEMPT WEIGHT BRANDS 37600

## OWNER(S) NAME AND ADDRESS

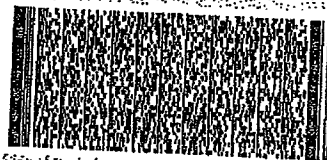
PLISE WILLIAM ROBERT  
 5740 DEL REY AVE  
 LAS VEGAS NV 89146-1202

## LIENHOLDER(S) NAME AND ADDRESS

LIENHOLDER(S) RELEASE - INTEREST IN THE VEHICLE DESCRIBED ON THIS TITLE IS HEREBY RELEASED.

SIGNATURE OF AUTHORIZED AGENT DATE

PRINTED NAME OR COMPANY STAMP



FEDERAL AND STATE LAW REQUIRES THAT YOU STATE THE MILEAGE IN CONNECTION WITH THE TRANSFER OF OWNERSHIP. FAILURE TO COMPLETE OR PROVIDING A FALSE STATEMENT MAY RESULT IN FINES AND/OR IMPRISONMENT.

The undersigned hereby certifies the vehicle described in this title has been transferred to the following buyer(s):

William W. Plise

Printed Full Legal Name of Buyer

Nevada Driver's License Number or Identification Number ☐ AND ☐ OR

Printed Full Legal Name of Buyer

Nevada Driver's License Number or Identification Number

Address

I certify to the best of my knowledge the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked.

5382

NO TENTHS

ODOMETER READING

Signature of Seller(s)/Agent/Dealership

I am aware of the above odometer certification made by the seller/agent.

Signature of Buyer

ACCORDING TO THE RECORDS OF THE DEPARTMENT OF MOTOR VEHICLES, THE PERSON NAMED HEREON IS THE OWNER OF THE VEHICLE DESCRIBED ABOVE, SUBJECT TO LIEN AS SHOWN.

RD-2 (Rev. 1/08)

Printed Name of Seller(s)/Agent/Dealership

William W. Plise

Dealer's License Number

Date of Sale

Printed Full Legal Name of Buyer

William W. Plise

CONTROL NO

0666949B  
 (THIS IS NOT A TITLE NO.)

ALTERATION OR ERASURE VOIDS THIS TITLE

# STATE OF NEVADA

DEPARTMENT OF MOTOR VEHICLES

## CERTIFICATE OF TITLE

|                           |                     |                |              |                     |                             |
|---------------------------|---------------------|----------------|--------------|---------------------|-----------------------------|
| VIN<br>1RF49564971041089  | YEAR<br>2007        | MAKE<br>BEAR   | MODEL<br>40' | VEHICLE BODY<br>TMH | TITLE NUMBER<br>NV002717814 |
| DATE ISSUED<br>06/11/2008 | ODOMETER MILES<br>0 | FUEL TYPE<br>D | SALES TAX PD | EMPTY WT            | GROSS WT                    |
| VEHICLE COLOR             | ODOMETER BRAND      |                |              | BRANDS              | 37600                       |
| EXEMPT. WEIGHT            |                     |                |              |                     |                             |

### OWNER(S) NAME AND ADDRESS

PLISE WILLIAM W.  
5550 PAINTED MIRAGE RD STE 500  
LAS VEGAS NV 89149-4584

### LIENHOLDER(S) NAME AND ADDRESS

BANK OF GEORGE  
9115 W RUSSELL RD STE 110  
LAS VEGAS NV 89148-1235

LIENHOLDER(S) RELEASE - INTEREST IN THE VEHICLE DESCRIBED ON THIS TITLE IS HEREBY RELEASED.

SIGNATURE OF AUTHORIZED AGENT \_\_\_\_\_ DATE \_\_\_\_\_

PRINTED NAME OR COMPANY STAMP \_\_\_\_\_

FEDERAL AND STATE LAW REQUIRES THAT YOU STATE THE MILEAGE IN CONNECTION WITH THE TRANSFER OF OWNERSHIP. FAILURE TO COMPLETE OR PROVIDING A FALSE STATEMENT MAY RESULT IN FINES AND/OR IMPRISONMENT.  
The undersigned hereby certifies the vehicle described in this title has been transferred to the following buyer(s):

Printed Full Legal Name of Buyer \_\_\_\_\_

Nevada Driver's License Number or Identification Number \_\_\_\_\_

☐ AND  
☐ OR

Printed Full Legal Name of Buyer \_\_\_\_\_

Nevada Driver's License Number or Identification Number \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

I certify to the best of my knowledge the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked.

ODOMETER READING ☒ NO TENTHS ☐ The mileage stated is in excess of its mechanical limits.  
☐ The odometer reading is not the actual mileage. WARNING: ODOMETER DISCREPANCY.  
☐ Exempt: Model year over 9 years old.

Signature of Seller(s)/Agent/Dealership \_\_\_\_\_

Printed Name of Seller(s)/Agent/Dealership \_\_\_\_\_

I am aware of the above odometer certification made by the seller/agent. ☐

Dealer's License Number \_\_\_\_\_

Date of Sale \_\_\_\_\_

Signature of Buyer \_\_\_\_\_

Printed Full Legal Name of Buyer \_\_\_\_\_

ACCORDING TO THE RECORDS OF THE DEPARTMENT OF MOTOR VEHICLES, THE PERSON NAMED HEREON IS THE OWNER OF THE VEHICLE DESCRIBED ABOVE, SUBJECT TO LIEN AS SHOWN.

CONTROL NO.

1342120B  
(THIS IS NOT A TITLE NO.)

RD-2 (Rev. 1/08)

ALTERATION OR ERASURE VOIDS THIS TITLE

**BILL OF SALE OF MOTOR VEHICLE**

**FOR AND IN CONSIDERATION** of the sum of One Hundred Twenty Thousand Dollars (\$120,000.00) in hand and of which receipt is hereby acknowledged,

William Plise of  
9880 W Pebble Rd  
Las Vegas, Nevada  
89178  
(Hereinafter "Seller")

hereby grant, sell, transfer, convey, deliver and give to

GT Productions LLC of  
Montana  
(Hereinafter "Buyer")

the following described Motor Vehicle:

|                     |   |
|---------------------|---|
| MAKE: Beaver        | VEHICLE IDENTIFICATION NUMBER (VIN):<br>1RF49564971041089 |
| MODEL: 40' Contessa | BODY COLOR: Brown, Tan                                    |
| YEAR: 2007          | ODOMETER READING: 7575 Miles                              |

**PAYMENT AND SCHEDULE**

The Buyer has paid Seller the full purchase price of Motor Vehicle. Payment was made via Cash.

**TITLE AND WARRANTY**

The Seller declares the following are true:

- a. The Seller is the lawful owner of the Motor Vehicle and has the legal right to sell the Motor Vehicle;
- b. That Seller will warrant and defend the title of the Motor Vehicle against any and all lawful claims and demands of all persons;
- c. The Motor Vehicle is currently subject to the following liens: \$220,000.00 is owed to Bank of George to pay off the remaining balance of the loan. These liens shall be



- c. The Motor Vehicle is currently subject to the following liens: \$220,000.00 is owed to Bank of George to pay off the remaining balance of the loan. These liens shall be removed on or before yes . The Seller warrants that there are no other liens, claims or encumbrances of any kind against the Motor Vehicle;

#### **MOTOR VEHICLE INSPECTION INFORMATION**

- a. The Seller disclaims all expressed or implied warranties as to the merchantability or fitness of the Motor Vehicle for a particular purpose;
- b. The Buyer has been given the opportunity to have the Motor Vehicle inspected. The Buyer has accepted the Motor Vehicle in its existing condition;

Seller:

Signature:

William Plise

Print Name:

William Plise

Buyer:

Signature:

Michael A. Anderson

Print Name:

Michael A. Anderson

Signed September 12, 2008.

#### **ODOMETER DISCLOSURE STATEMENT**

**Federal law requires that the mileage is stated upon transfer of ownership. Failure to complete or falsifying this statement may lead to fines and/or imprisonment.**

The Seller hereby declares that the Motor Vehicle Odometer currently reads 7575 Miles. The Seller also declares that to the best of his or her knowledge the Odometer reading is accurate and displays the actual mileage of the Motor Vehicle.

##### Seller Information

William Plise  
9880 W Pebble Rd  
Las Vegas, Nevada  
89178

##### Buyer Information

GT Productions LLC  
3105 SIMONLEAF CT.  
LAS VEGAS NV  
89117

Make: Beaver

Model: 40' Contessa

Year: 2007

Vehicle Identification Number (VIN):

1RF49564971041089

Body Color: Brown, Tan

Odometer Reading:

Seller:

Buyer:

Signature

William D. Plise

Signature

Michael A. Halverson

Print

Name:

William D. Plise

Print

Name:

Michael A. Halverson

Signed September 12, 2008.